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July 8, 1988

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NJDEP
Industrial Site
Evaluation Element
CN 028
Trenton, NJ 08625

HAND DELIVERED

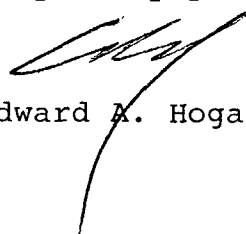
Mr. Michael Nalbene
Bureau of Environmental
Evaluation and Cleanup
Responsibility Assessment
Industrial Site Evaluation
Element
New Jersey Department of
Environmental Protection
401 East State Street
Fifth Floor
Trenton, New Jersey 08625

Re: Fine Organics Corp. Facility
Formerly Owned By Hexcel Corp.
Lodi, New Jersey
ECRA Case No. 86009

Dear Mike:

Enclosed please find a letter to you from Robert Powell of Environ Corporation requesting an extension of time to complete the on-site sampling and to prepare a Cleanup Plan. If you have any questions or need additional information, please contact either Mr. Powell or me.

Very truly yours,


Edward A. Hogan

EAH:dtm
Enclosure

cc: Mr. William Nosil (with enclosure)
Robert L. Powell, Ph.D., P.E. (with enclosure)

SDMS Document



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June 30, 1988

Mr. Mike Nalbone
Case Manager
New Jersey Department of Environmental Protection
Bureau of Environmental Evaluation and Cleanup
Responsibility Assessment
401 East State Street, 5th Floor
Trenton, NJ 08608

Re: Fine Organics Corporation facility (formerly owned by
HEXCEL Corporation)
Lodi, New Jersey
ECRA Case No. 86009

Dear Mr. Nalbone:

The purpose of this letter is to request, on behalf of my client HEXCEL Corporation, an extension of 120 days to complete the on-site sampling plan and an additional 90 days to complete the cleanup plan for the Fine Organics Corporation facility in Lodi, New Jersey.

The initial ground water and soil sampling program was conditionally approved by the New Jersey Department of Environmental Protection (NJDEP) on December 29, 1987. As a result of additional information regarding on-site conditions that became available after the sampling plan was initially drafted, an amended sampling plan was submitted to the BEERCA on February 2, 1988, and a followup meeting to discuss the amended plan was requested. The amended plan was reviewed by the BEERCA and rejected by letter dated April 26, 1988. As a result, major areas of concern remained unresolved regarding 1) the utility of data to be collected during the on-site investigation and 2) the potential for spread of contamination as a direct result of the on-site investigation. A followup letter to the BEERCA on these concerns was submitted on May 4, 1988 and a review meeting was again requested. After subsequent discussions with you, Mr. John DeFina and Mr. Ken Hart of the BEERCA, a meeting was held on June 16, 1988 to discuss these issues. We are currently awaiting a decision by the BEERCA regarding these issues.

The resolution of these sampling issues, which were the subject of the aforementioned correspondence and discussions, directly affects the conduct of the on-site sampling program. Therefore the on-site investigation has not yet commenced. Based on the availability of the drilling subcontractor, the on-site investigation is scheduled to begin on or about July 29, 1988. In order to allow sufficient time to complete this work, review and interpret the results, prepare a detailed data report, and develop recommendations for any additional sampling and testing, a time extension of 120 days is hereby requested. This extension is based on our expectation that the field work will begin in approximately 4 weeks. The drilling program will require 3 to 4 weeks, followed by laboratory analyses, which would require an additional 4 to 6 weeks. After receiving and reviewing the laboratory data, final data compilation, formulation of any recommendations for additional sampling and writing of a final data report are expected to require approximately 60 days. The data report of this on-site investigation and any recommendations for additional testing would be submitted to you on or before November 23, 1988.

Following completion of the on-site investigation, a detailed Cleanup Plan will be prepared as required by Condition Nos. 5 and 35 of your Conditional Letter of Approval. This plan will be based on data collected during this on-site investigation and, therefore, the development of the Cleanup Plan cannot begin until these data are available. Since the Cleanup Plan is required to contain detailed descriptions and designs for the remedial program, it is expected that approximately 90 days will be required to complete this plan from the point of completion of the Phase I on-site investigation data report. Any followup on-site testing would be conducted concurrent with the drafting of the Cleanup Plan. The final Cleanup Plan would be submitted to the BEERCA on or before February 21, 1989. If the plan is completed before this date, we will, of course, submit it as soon as possible.

Since the beginning of the ECRA review of this facility HEXCEL Corporation has desired to expedite the on-site investigations and resolution of this matter. This is evident by our already voluntarily completing certain on-site investigative work "at risk," which has partially implemented the sampling plan, and providing on-site remedial measures to preclude the potential for any off-site chemical release while the ECRA investigation is underway. The requested extensions are essential to allow sufficient time to develop a scientifically reliable, defensible data base which will form the primary basis for the identification and design of any necessary remedial measures.

You indicated in your letter of April 26, 1988 that an extension, if needed, would be granted. We look forward to your written response in this matter. If you have any additional questions or concerns, please call.

Sincerely,



Robert L. Powell, Ph.D., P.E.
Principal

RLP:ljt
0064m

cc: A. William Nosil, HEXCEL Corporation
Edd Hogan, Esq.

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